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January 24, 2025

VIA ECF

The Honorable Ronnie Abrams
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Bay Street Advisors, LLC v. Mahoney, Case No. 24-cv-09139-RA

Dear Judge Abrams:

We represent Plaintiff Bay Street Advisors, LLC in the above matter. We submit this letter on behalf of both Parties, pursuant to Rule 1.D. of Your Honor's Individual Rules and Practices, to jointly and respectfully request that the Court: (1) grant an extension of time to file the Parties' joint status letter, from January 24, 2025 to January 31, 2025, and (2) adjourn the conference currently scheduled for January 31, 2025 to such later date as is convenient for the Court.

On December 3, 2024, the Court entered an Order and Notice of Initial Conference requiring that the Parties' submit a detailed joint status letter on January 24, 2025, and that they appear for an initial conference on January 31, 2025. (Dkt. No. 9). At that time, Defendant Kevin P. Mahoney's response to the Complaint was due on December 24, 2024. Defendant requested, and Plaintiff consented to, an extension of time to January 21, 2025, to file its response, which the Court granted. (Dkt. No. 14).

On January 21, 2025, Plaintiff's counsel requested that Defendant agree to delay filing of his answer and counterclaims to January 24, 2025, allowing the parties to conduct good-faith settlement discussions. The Parties jointly submitted an extension request later that evening (Dkt. No. 15), which was granted by the Court on January 22, 2025. (Dkt. No. 16). Unfortunately, a settlement was not reached.

Given that Defendant's responsive pleading will be filed today, January 24, 2025, the Parties require additional time to draft their joint letter.

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This is the Parties' first request for an extension of time to file the joint status letter, and for an adjournment of the initial conference. Both Parties consent to this request.
Respectfully,

/s/ Miguel A. Lopez

Miguel A. Lopez

Application granted. The initial conference previously scheduled for January 31, 2025 is hereby adjourned to February 14, 2025 at 10:45 a.m. The parties shall file a joint letter and proposed case management plan and scheduling order no later than February 7, 2025.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', is written over a horizontal line.

Hon. Ronnie Abrams
January 27, 2025